

Message

From: Vyas, Himanshu [vyas.himanshu@epa.gov]
Sent: 5/18/2022 5:34:21 PM
To: Bennett, James [bennett.james@epa.gov]
Subject: FW: Monthly National UIC Call

My notes on this call; I think there are official notes that get sent around but I only thought of that later, and since I wrote down things, might as well share them with you.

National UIC call. 5/18/22

- Doug Minter: send email to him about ideas on the national UIC managers call. Would you want in-person, hybrid, online only? Timeframe of when to hold the meeting?
 - o Doug will send out an email with a request to respond.
- Molly McEvoy: 6 components of the Class VI strategy:
 - o Further EJ considerations in Class VI permitting
 - Use of EJ Screen, for example
 - We have authority for additional requirements to mitigate
 - Incorporate new processes in Class VI permitting: would require a memo from OW to the Regions
 - Explore trigger points which would lead to additional requirements in Class VI permit (within EJ community? Enhanced communication?)
 - Conducting community forums
 - Posting applications early in the process so it's publicly available long before public comment period
 - o New expectations for states. Letter to governors regarding Class VI primacy expectations
 - More EJ
 - Encourage states to do the same as what EPA will do regarding EJ
 - Incorporating EJ requirements into UIC STAG requirements
 - Class VI Grant will be a new grant program separate from existing UIC STAG money, so states will create a new workplan and incorporate these requirements into their workplan.
 - o Robust EPA guidance, tools, and training
 - For applicants
 - For Class VI primacy states
 - Update guidance once we know our enhanced EJ requirements
 - Guidance on how applicants can engage communities
 - o Clarify the regulatory requirements between Class II and Class VI
 - Wells that were historically acid gas injection wells but now there is much more quantity of CO2 (don't think this is relevant to Region 3 since we don't have sour oil and gas production zones here)
 - 45Q connection; it doesn't specify well classification so work with Treasury Dept to clarify its use in Class VI only
 - o Ask White House to establish a holistic EJ evaluation for CCUS projects

We (R3 UIC) might need a call with Louisiana (with R6 cooperation) in how they did their Class VI primacy in order to have West Virginia do the right sort of things in their regulatory package. Maybe HQ can share Louisiana's program description which has language re: EJ?

Arnold Bierschenk: If the federal rules do not really include EJ, how easy is it to require primacy equivalency including EJ, which is based on only an E.O.? Louisiana included E.J. because they have incorporated it into their State rules. Not all states have done so.

- Not sure this concern was addressed.

Doug Minter: What I am hearing is that EJ will not inform Class VI "stringency" regarding primacy but is expected for primacy implementation as described in the Program Description, correct?

Bill Bates: basically, yes. That's true.

Bruce Kobelski: there's a new "Rules and Tools Crosswalk" document to help applicants of Class VI. Developed with help of NETL. Will release the document, which will be on the NETL website; a brief writeup and crosswalk table. Hoping to get this report in "Bundle 3", will do outreach afterward. Bruce: next topic: PFAS destruction and relocation strategy developed back in 2020/2021. Most of the document developed by RCRA and CERCLA; UIC part related to Class I to dispose of PFAS, NOT use Class V. We gave info on Class I Haz wells as potential disposal option, put it out for comment; received comments. But meanwhile, EPA has moved on. There's a big overarching committee to guide Agency-wide work on PFAS. R10 asked about a situation up on AK North Slope: want to use Class I non-haz well for PFAS. Other municipal waste instances have used Class I non-haz which likely has PFAS though not known. Bruce giving heads-up re: what we're doing with Class I non-haz. If PFAS becomes haz or RCRA haz, then we must use Class I haz waste wells only. There are a lot of limitations to using Class I to begin with.

- R6 recently got a FOIA requesting any info on PSFA Class I wells.

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From: Bates, William <bates.william@epa.gov>

Sent: Tuesday, May 17, 2022 6:22 PM

To: UIC Conference Call Contacts <UIC_Conference_Call_Contacts@epa.gov>; Mullee, Alexander <Mullee.Alexander@epa.gov>

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Subject: Monthly National UIC Call

Good afternoon all,

Below is the agenda for tomorrow's discussion

- Welcome
- ESA – Section 7 resource: Kaitlyn Bendik (OP)
- UIC Annual Managers Meeting: Douglas
- Class VI
 - Class VI Strategy: Molly
 - Rules and Tools Report: Bruce
- Class I Injection wells – PFAS: Bruce
- MVWDW compliance advisory: Jill
- GWPC: Bill
- UIC Inspector Training
 - Region 3 is starting to prepare for the UIC credential training and it would be helpful for the Region if the regions could send an email to Kevin Rowsey on the current known people in the region who needs the training and if they would prefer the training to be remote or in person. Region 3 is interested in peoples thoughts on having the training in person.
- Round Robin

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[Call or chat with me on Microsoft Teams](#)